

# EXHIBIT A



Deposition of:  
**Anne Roberts , M.D.**

*July 7, 2017*

In the Matter of:  
**In Re: Bard IVC Filters Products  
Liability**

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## In Re: Bard IVC Filters Products Liability

<p style="text-align: right;">Page 78</p> <p>1 A Yeah. Not so much now as I was some</p> <p>2 time ago. I still am on one of their committees,</p> <p>3 but I haven't been as active in that -- I was much</p> <p>4 more active earlier.</p> <p>5 Q And you're also a member of numerous</p> <p>6 other professional societies in your C.V.; is that</p> <p>7 right?</p> <p>8 A Yeah.</p> <p>9 Q To your knowledge, have any of the</p> <p>10 societies that we've mentioned -- SIR, American</p> <p>11 College of Radiology, Western Angiographic and</p> <p>12 Interventional Society, Radiological Society of</p> <p>13 North America, American Board of Radiology,</p> <p>14 American Heart Association -- have any of those</p> <p>15 organizations ever taken the position that Bard's</p> <p>16 retrievable IVC filters carry more risks than</p> <p>17 other IVC filters?</p> <p>18 MR. JOHNSON: Form.</p> <p>19 THE WITNESS: If -- you mean as a</p> <p>20 society statement?</p> <p>21 BY MR. BROWN:</p> <p>22 Q Correct.</p> <p>23 A Not to my knowledge.</p> <p>24 Q To your knowledge, have any of the other</p> <p>25 professional societies of which you're a member of</p>	<p style="text-align: right;">Page 80</p> <p>1 Q And the C.V. that we've marked as</p> <p>2 Exhibit 4 listed 682 presentations.</p> <p>3 A Let's see. This one has 682. I think</p> <p>4 the new one has a few more.</p> <p>5 Q And your publications and presentations</p> <p>6 are made to other physicians who are treating</p> <p>7 patients, correct?</p> <p>8 A Largely, yeah. I would say most of them</p> <p>9 go -- are for other physicians. Some of them are</p> <p>10 ones to other types of groups. But mostly other</p> <p>11 physicians.</p> <p>12 Q You've never published or presented to</p> <p>13 the medical community that Bard's retrievable</p> <p>14 filters have higher rates of complications than</p> <p>15 other filters, have you?</p> <p>16 MR. JOHNSON: Form.</p> <p>17 THE WITNESS: I would say that I have</p> <p>18 not published that. I've talked -- I've given</p> <p>19 presentations early -- relatively early on on the</p> <p>20 retrievable filters. And -- I mean, I wouldn't</p> <p>21 know for sure, but I would imagine that I probably</p> <p>22 -- you know, probably in the early 2000s once</p> <p>23 there was a problem with the filters, I wouldn't</p> <p>24 be surprised that I commented that there was a</p> <p>25 problem with those filters.</p>
<p style="text-align: right;">Page 79</p> <p>1 taken the position that Bard's retrievable IVC</p> <p>2 filters carry more risks than other IVC filters?</p> <p>3 MR. JOHNSON: Form objection.</p> <p>4 THE WITNESS: Again, not to my knowledge</p> <p>5 have any of them made a societal determination of</p> <p>6 that.</p> <p>7 BY MR. BROWN:</p> <p>8 Q Your C.V. lists 106 articles that you've</p> <p>9 written in peer-reviewed journals?</p> <p>10 A You probably read it more recently than</p> <p>11 I have. Well, a peer-reviewed -- let's see. Wait</p> <p>12 a minute. I have to go and look for the</p> <p>13 peer-reviewed -- let's see. 106, yes.</p> <p>14 Q Your C.V. lists 76 book chapters that</p> <p>15 you've written?</p> <p>16 A Again, I haven't counted them recently.</p> <p>17 But I'm assume you probably have counted them.</p> <p>18 That's abstract.</p> <p>19 Q Page 43 of the C.V. that we've marked</p> <p>20 Exhibit 4 --</p> <p>21 A 76, looks like.</p> <p>22 Q So 76 book chapters that you've written?</p> <p>23 A Yes.</p> <p>24 Q And your C.V. lists 91 abstracts?</p> <p>25 A Yes.</p>	<p style="text-align: right;">Page 81</p> <p>1 BY MR. BROWN:</p> <p>2 Q But you can't identify anything for us</p> <p>3 today, can you?</p> <p>4 A I -- no. But I would think that it's</p> <p>5 probably likely.</p> <p>6 Q Shifting gears a little bit, what is</p> <p>7 your hourly rate in this litigation?</p> <p>8 A \$750 an hour, I think. And I'm sorry.</p> <p>9 I don't -- had my secretary given that to me --</p> <p>10 and it's more for depositions, and it's more if I</p> <p>11 have to testify. It's in the letter.</p> <p>12 Q For the work that you've done preparing</p> <p>13 the report in this case, you charge \$750 an hour?</p> <p>14 A Mm-hmm.</p> <p>15 Q "Yes"?</p> <p>16 A Yes. Sorry.</p> <p>17 Q That's all right.</p> <p>18 What is your hourly rate to testify at a</p> <p>19 deposition?</p> <p>20 A That's what I was looking for. It's</p> <p>21 basically -- I have a form that, you know, my</p> <p>22 administrative assistant sends out that outlines</p> <p>23 all of my charges for -- whether it's doing things</p> <p>24 -- you know, reviewing material or whether it's</p> <p>25 doing a deposition or having to testify at a</p>